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M E M O R A N D U M

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MAR 31 1986

IEPA-DLPC

DATE: March 28, 1986

TO: Gary King - Enforcement

FROM: Tom Powell - DLPC - Collinsville

SUBJECT: LPC 1630100015 - St. Clair Co. - Belleville/Scott Air Force Base
IL7570024177
Field Operations

On March 25, 1986 a RCRA follow-up inspection was conducted at the subject facility. This visit was in conjunction with a RCRA inspection conducted by USEPA, Region V. Representing IEPA on the follow-up visit were Mike Grant and Tom Powell of the Collinsville Regional Office. USEPA was represented by Marge Dilday and Pablo Go both of whom were representing the Environmental Services Division, Central District Office. Upon our unannounced arrival, Scott's Environmental Coordinator Lt. Munnel was not available. We then met with Dennis Tudor, Chief of Environmental Engineering and Planning, a position that he has held for seven (7) weeks.

IEPA representatives were present, as previously stated, to determine compliance with outstanding violations that were identified during the May 8, 1985 annual RCRA inspection. This visit was the second "follow-up" scheduled, the first being on January 21, 1986. As a result of this "second follow-up" visit, the following violations remain unresolved.

Section 725.113(b) - A written waste analysis plan is not available. Mr. Tudor stated that every drum is sampled before it is shipped for disposal, nevertheless, a written plan is required.

Section 725.116 - Although a training program has been established, not all personnel have been trained. (Note: The amended SPCC plan has not been completed and approved by senior base personnel, the training program therefore does not address the latest revision of the SPCC plan.)

Section 725.152 - The revised "Spill Prevention Plan" is presently being prepared in the facility's word processing unit. This final plan however has not yet been "signed off" by upper management. In addition, Annex 2 through 11 of the plan are still in draft form, subject to revisions.

The inspection did resolve one outstanding violation, that being the submittal of a revised Part A to resolve the violation identified in Section 703.154.

LPC 1630100015
St. Clair County
Belleville/Scott Air Force Base
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This memo constitutes a request for a 31(d) meeting so that specific compliance dates can be scheduled with the facility. Scott has already failed to comply with the informal time frame (6 months) that was outlined in a letter from Mark Haney dated September 18, 1985. If the facility fails to "Return to Compliance" within the time frame established as a result of the 31(d) meeting, the Agency will then be able to proceed with enforcement with additional leverage.

TEP:cas/0024L

cc: DLPC - Division File
cc: DLPC - Collinsville
cc: Enforcement - Bruce Carlson
cc: Glenn Savage

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